

July 2, 2007

Robert H. Curtis, P.E.
Regional Design Engineer
NYS Department of Transportation, Region 7
317 Washington Street
Watertown, NY 13601

Re: P.I.N. 7804.26 Fort Drum Connector Route (I-81 to Fort Drum North Gate)
Towns of Pamela and Le Ray, Jefferson County, New York

Class: EC-2

Dear Mr. Curtis:

The Environmental Protection Agency (EPA) has reviewed the draft Design Report/Environmental Impact Statement (DR/EIS) (P.I.N. 7804.26 or CEQ # 20070188) for the Fort Drum Connector Route (I-81 to Fort Drum North Gate) in the Towns of Pamela and Le Ray, Jefferson County, New York pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Fort Drum Army Base is home to the 10th Mountain Light Infantry Division with approximately 17,000 troops and their families, for a total military related population of approximately 32,000. In 2005, the 3rd Combat Brigade was assigned to the 10th Mountain Division which increased the population by approximately 10,000. Fort Drum Army Base also serves many other users as a premier military training facility and also as a power projection airport capable of handling the largest airplanes in the world. Because of the increased traffic volume and safety concerns associated with the expansion the 10th Mountain Division at Fort Drum, the New York State Department of Transportation (NYSDOT) in cooperation with the U.S. Department of Transportation's Federal Highway Administration seeks to improve the transportation link between Interstate 81 (I-81) to Fort Drum by constructing a new interchange and a new alignment that would provide a four-lane connection.

Three primary purposes and needs identified in the draft DR/EIS for the Fort Drum Connector Route Project are to: (1) enhance the strategic viability of Fort Drum; (2) address increased and anticipated traffic volumes; and (3) address safety concerns. In addition to a No-Build or "Null" Alternative, the draft DR/EIS proposes three feasible alternatives including: (1) Northern Alternative (NC4): a 4.3 mile four-lane, interstate style, divided highway on new alignment; (2) Middle Alternative (MC9): a 4.9 mile four-lane divided highway with a combination of state type facilities and interstate type facilities; and (3) Southern Alternative (SC6): a 5.8 mile four-lane, interstate style,

divided highway on new alignment. The Northern Alternative (NC4) is recommended as the preferred alternative.

The draft DR/EIS indicates that the Northern Alternative (NC4) impacts the greatest amount of wetland area of 3.94 acres, the Middle Alternative (MC9) impacts 3.43 acres, and the Southern Alternative impacts the least amount of wetland area (2.32 acres). The Section 404(b)(1) Guidelines of the Clean Water Act require that an explanation be presented in those instances where the least environmentally damaging practicable alternative (LEDPA) is not selected. EPA believes that the draft DR/EIS needs to present a more clear and thorough explanation for preferring the Northern Alternative (NC4) over the less wetland damaging Southern Alternative (SC6). Furthermore, EPA is concerned that mitigation measures for the Northern Alternative (NC4) have not been better defined.

As stated in Volume I, Chapter IV, Pages 94 thru 99 of the draft DR/EIS, an analysis of proposed mitigation of wetland impacts is required in an EIS. We understand that investigations are currently on-going to identify additional locations and options that may be available and suitable for compensatory mitigation, including Prior Converted Croplands. EPA strongly recommends that mitigation measures be identified and stipulated within the final DR/EIS for the selected alternative.

Given these comments, we have rated the recommended preferred Northern Alternative (NC4) as Environmental Concerns - Insufficient Information (EC-2). Please see the enclosed Rating Factors for a description of EPA's rating system.

We appreciate the opportunity to review this draft DR/EIS. When the final DR/EIS is released for public review, please send two copies to the address above. If you have any questions, please contact Grant Jonathan, our project reviewer, at 212-637-3843 or at jonathan.grant@epa.gov.

Sincerely yours,

John Filippelli, Chief
Strategic Planning and Multi-Media Programs Branch

Enclosure: Summary of EPA Rating Definitions

cc: L. Gosselin (NYSDOT)
E. Reape (NYSDOT)
R. Griffith (FHWA)

bcc: D. Montella, DEPP-CEPB
M. Laurita, DEPP-APB
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